

Nebraska Balance of State CoC NOFA

Competition Policies 2015

1. **Renewal of Grants**

- a. The CoC will renew expiring CoC funded grants provided that:
 - i. There is a continuing need in the CoC for project and the services provided to homeless people
 - ii. The project has satisfactory performance in terms of meeting the performance targets set by the CoC
 - iii. The grantee has regularly contributed data to HMIS
 - iv. There have been no significant unresolved monitoring findings
 - v. The grantee has substantially expended prior grant funds
 - vi. The grantee is participating (to the extent possible) in the CoCs coordinated entry process
- b. Ranking of renewal grants
 - i. The CoC will rank the grants for renewal in a priority order according to their performance scores. Grants with the lowest performance scores will be ranked in Tier 2. Grants that are not comparable but essential to the CoC – HMIS and planning – will be ranked in Tier 1.

2. **Reallocation of Grants**

- a. Grantees are strongly encouraged to review their programs. Transitional Housing projects in particular should assess whether:
 - i. There is continuing need for the project
 - ii. The project is succeeding in accomplishing CoC outcomes
 - iii. The project is targeted to a population in transition
- b. Grantees with projects with satisfactory performance may voluntarily reallocate their project to a higher priority need (permanent housing)
 - i. Grantees voluntarily reallocating will be able to retain the current HUD dollar commitment to be used for the reallocated project
- c. Grantees that are not meeting the CoC determined performance benchmarks are at risk of having their funding involuntarily reallocated to a new project and provider
 - i. Grantees not meeting performance benchmarks will have a six month period in which to improve performance.
 - ii. Grantees may develop a plan of correction to address performance shortcomings. Grants with a plan of correction, approved by the CoC, and who are in compliance with the approved plan of correction, will be eligible to renew their grants.
 - iii. HMIS will re-issue performance reports every six months. Grantees who are substantially below performance benchmarks for two six-month performance reporting periods, will risk non-renewal of their grants in the 2017 competition.
- d. Any CoC funding that is involuntarily reallocated will be made available to other eligible applicants in the CoC through a competitive process (described below under New Funding).

- i. Grantees may reapply for funding that was involuntarily reallocated but must demonstrate in their applications that performance issues in prior grant will not impact the new grant request.

3. New Funding

- a. New funding includes: funds from involuntary reallocation; possible bonus funding; and any new funding possibilities from HUD.
- b. All new funds will be competitively awarded
- c. The CoC will proactively engage in outreach to potential providers and seek to engage the participation of new organizations, in particular those serving underserved populations in the CoC
- d. Applicants for funds will be reviewed according to an objective scoring rubric, approved in advance by the CoC.
- e. Applications will be reviewed and scored by the new project/renewal evaluation committee provided that any member of the committee that has any interest in any application being submitted may not participate in those discussions. For the purpose of reviewing new project applications, if a member of the New Project/renewal evaluation committee has any conflict with respect to any application, he/she shall recuse him/herself and ask that his/her CoC appoint a replacement who has no conflict to serve on the committee for the purpose of reviewing new applications submitted.
- f. Project applicants achieving the highest scores will be selected

4. Transitional Housing Priorities

- a. The following are the priority populations to be served by transitional housing:
 - i. Youth
 - ii. Persons seeking to continue recovery in recovery-focused housing
 - iii. Institutional re-entry (may not be eligible for CoC funding but needed from people leaving criminal justice and mental health facilities)
 - iv. Persons fleeing domestic abuse or violence where it is not possible to find units for rapid rehousing
- b. Transitional housing grants successfully meeting performance standards and serving a priority population will continue to be eligible for renewal.
- c. Transitional housing projects not serving a priority population will be encouraged to reallocate to a permanent housing project. In future CoC competitions, TH projects not serving a priority population may be required to reallocate.

5. Permanent Supportive Housing and Housing First

- a. Housing First. Providers of permanent supportive housing shall use the Housing First model as outlined below. Any new projects funded by the CoC must use the Housing First model. Any existing permanent supportive housing project that has indicated in application to HUD that it employs the Housing First model must follow the standards as set forth below. Existing permanent supportive housing projects that have not indicated Housing First are 'grandfathered' from this policy.
- b. Housing First projects defined:
 - i. Housing is not contingent on compliance with services – participants are provided with a standard one year lease agreement. The lease agreement can

only be terminated in accordance with the State of Nebraska Uniform Residential Landlord and Tenant Act (76-1401 to 76-1449)

- ii. Participants are provided with services and supports to help maintain housing and prevent eviction.
- iii. There is no requirement for sobriety prior to being offered housing and admission shall not be conditioned on credit or background checks. Criminal backgrounds will be considered only to the extent necessary to protect safety and well-being.
- iv. Participants shall be given choice in their housing subject to program limitations.
- v. Participants are not required to participate in services but providers are required to persistently and consistently seek to engage participants.
- vi. Providers are encouraged to support staff in implementing Evidence Based Practices that support Housing First (Critical Time Intervention, Motivational Interviewing, Stages of Change)

6. Prioritization of Chronic Homeless in Permanent Supportive Housing

- a. The CoC will follow the prioritization of persons and families for permanent supportive housing according to the Notice issued by HUD (CPD-14-012). This prioritization policy will be used to determine referrals to permanent supportive housing through the MVRT (Most Vulnerable Review Team).
- b. Referrals to all PSH units in the CoC will be made through the MVRT process.
- c. CoC funded PSH providers will not maintain separate waiting lists for available units; there will be a single consolidated list through the MVRT process.
- d. Participation in the MVRT process is mandatory for all CoC funded PSH projects.

7. Grievance Policy

- a. It is the intent of the CoC to conduct the competition in a fair, equitable and transparent manner.
- b. A grievance may be filed by any applicant organization that claims it has been adversely affected by:
 - i. Improper application of rules, regulations and procedures concerning participation in the Consolidated Grant application process;
 - ii. Improper interpretation of rules, regulations and procedures concerning participation in the Consolidated Grant application process;
 - iii. Disparity in the application of rules, regulations and procedures regarding participation in the Consolidated Grant application process;
 - iv. Violation of rules, regulations or procedures concerning participation in the Consolidated Grant application process;
 - v. The score assigned to the application
- c. Grievances must be made in writing to the CoC with three working days of the event that triggered the grievance. The grievance must be specific regarding the alleged violation.
- d. The CoC will review all grievances within three working days and provide a written response.
- e. The officers of the CoC will serve as the Grievance Committee of the CoC.

- f.** Applicant organizations not satisfied with the CoC response may submit an appeal to HUD under 24 CFR 578.

2015 NE BOS Renewal Performance Evaluation Standards

Renewal Performance Evaluation Criteria	Unit Type	Source	Proposed Benchmark/ Standard		Comments	2015 Points
PERFORMANCE			PH	TH		
1. Occupancy/Utilization (Average of 4 reported PIT counts)	Average Point in Time	APR	90% = 10, 85-89% = 5		Family projects only count households	10
2. For program entrants, at least one adult per household w/previous residence that indicates literal homelessness	All Adults	APR	100% PSH	70% (RRH and TH)	Requirement for new PH projects	10
3. Percentage of all adult leavers who gained or increased EARNED income from entry to exit	Adults - Leavers	APR	10%	40%		10
4. Percentage of all adult leavers who gained or maintained OTHER (non-employment) income from entry to exit	Adults - Leavers	APR	25%	25%		10
5. All adult participants with non-cash benefits	All Adults	APR	70%			10
6. Percentage of all participant leavers who exited to shelter, streets or unknown	Participants - Leavers	APR	Less than or equal to 10%		Family projects only count households	10
7. Spending of last year's HUD grant	N/A	APR	100% = 10; 95-99% = 8; 90-94% = 4			10
8. PSH Programs: Percentage of all leavers who remain in PSH or exited to PH	Participants - Leavers	APR	90%	n/a	family projects only count households	10
9. TH & RRH Programs: Percentage of all leavers who exited to Permanent Housing	Participants - Leavers	APR	85%	80%	Family projects only count households	10
10. TH Only - Length of stay for all participants is 1 year or less	All Participants	APR	n/a	75%		None*
11. RRH Only - Length of stay for all participants is 6 months or less	All Participants	APR	85%	n/a		None*
Performance total score						80
CONSUMER SURVEYS						
12. Consumer Surveys - Response Rate	All Adults	CS	35%			5
13. Consumer Surveys - Results	N/A	CS	30 Points or greater			5
Consumer Surveys total score						10
COMPLIANCE						
14. Match equals or exceeds requirement	N/A	APR	100%			5
15. Monitoring - HUD Findings	N/A	Provider Report	No findings or all issues/findings resolved			5
16. HUD Drawdown within 90 days	N/A	Provider Report	<91 days			5
Compliance total score						15
HMIS						
17. HMIS Universal Data Elements null/unknown	All Participants	APR/HMIS	<=5%			5
HMIS total score						5
Grand Total						110

*data will be collected to establish baseline for future standards